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7 Attorneys for Creditor
Roebbelen Contracting, Inc.

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10 UNITED STATES BANKRUPTCY COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

13 In re
14 PG&E CORPORATION,
15 Debtor-in-Possession.

Case No. 19-30088-DM
Chapter 11
Hon. Dennis Montali

16 In re
17 PACIFIC GAS AND ELECTRIC
18 COMPANY,
19 Debtor-in-Possession.

Case No. 19-30089-DM
Chapter 11
Hon. Dennis Montali

**DECLARATION OF FRANK LINDSAY
IN SUPPORT OF ROEBBELEN
CONTRACTING, INC.'S RESPONSE TO
CERTAIN FIRST DAY MOTIONS**

20 Date: January 31, 2019
21 Time: 10:00 a.m.
22 Ctrm: 450 Golden Gate Ave., 16th Floor
San Francisco, CA 94102

23 I, Frank Lindsay, declare as follows:

24 1. Except as indicated otherwise, I have personal knowledge of the matters set forth
25 in this declaration and, if called upon to testify, I could and would competently testify thereto. I
26 am over 18 years of age. I am the Vice President of Roebbelen Contracting, Inc. ("Roebbelen"),
27 and I make this declaration in support of Roebbelen's Response to Certain First Day Motions.
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2. As of the December 31, 2018, the Debtors owe Roebbelen a total of approximately \$37,789,503-\$38,789,503 (of which approximately \$6,279,162 is retention).

3. Roebbelen retains lien rights for no less than 99.8% of the amounts owed to it by the Debtors as of January 29, 2019.

4. Roebbelen currently has approximately 80 projects under construction with the Debtors' Corporate Real Estate group ("CRESS"), which supports the Debtors' strategic initiatives of safety, reliability, affordability, and consumer focus, which began prior to January 29, 2019. At least 80% of these projects support the Debtors' service centers and training facilities. The improvements performed by Roebbelen are designed to result in quicker response times, improved vehicle maintenance, better logistics for replacement materials, hazardous materials storage, improvements to dispatch conference centers ("bull rooms") including solutions for mapping, tracking outages, and safety trainings. Roebbelen is implementing a security program for these same facilities including upgrading their fencing and security systems to meet their improved security standards. I am informed and believe that the Department of Homeland Security has identified these facilities as known targets, and their operation is essential in the case of a major catastrophic event.

5. Roebbelen also performed work prior to January 29, 2019 on the Debtors' Fire Watch Command Center located in their headquarters at 77 Beale Street in San Francisco. I am informed that the services provided there include monitoring video observation sites, sensors, meteorology, monitoring of fire and police blotters, and the ability to turn off power at specific locations.

I declare under penalty of perjury that the above statements are true and correct. This declaration is executed on January 31, 2019, in El Dorado Hills, California.

/s/

Frank Lindsay